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### *Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

DAVID HOUGH; *et al.*

## Plaintiffs,

VS.

RYAN CARROLL; *et al.*

### Defendants.

Case No.: 2:24-cv-02886-WLH-SK

**STIPULATION TO STAY  
DEFENDANT MATTHEW  
CROUCH'S TIME TO FILE A  
RESPONSIVE PLEADING  
PENDING PLAINTIFFS'  
FORTHCOMING SECOND  
AMENDED COMPLAINT**

**STIPULATION TO STAY DEFENDANT MATTHEW CROUCH'S TIME TO  
FILE A RESPONSIVE PLEADING PENDING PLAINTIFFS'  
FORTHCOMING SECOND AMENDED COMPLAINT**

1           This Stipulation is entered into by and between Plaintiffs on the one hand, and  
2 Defendant Matthew Crouch, on the other hand, through their respective counsel of  
3 record.

4           WHEREAS, Plaintiffs have received third-party documents and intend to  
5 amend the currently operative First Amended Complaint to add new defendants and  
6 new allegations about existing defendants;

7           WHEREAS, Plaintiffs require additional time to investigate entities and  
8 individuals to potentially be added as defendants, and to further investigate  
9 forthcoming new allegations about existing defendants;

10          WHEREAS, Plaintiffs anticipate that new discovery, will significantly further  
11 inform Plaintiffs' allegations;

12          WHEREAS, it would be most efficient—and in the interests of justice—for  
13 Plaintiffs to wait to file a second amended complaint until Plaintiffs have reviewed  
14 the forthcoming discovery that they anticipate receiving shortly;

15          WHEREAS, it would also be inefficient for Defendant Matthew Crouch to  
16 respond to the currently operative complaint when the parties anticipate that another  
17 amended complaint will be filed;

18          IT IS HEREBY STIPULATED AND AGREED by the parties as follows:

19          The deadline for Defendant Matthew Crouch to file responsive pleadings to the  
20 current complaint should be stayed.  
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Matthew Crouch should be ordered to file a responsive pleading no later than 30 days from the date Plaintiffs file their amended complaint.

This stipulation is made without prejudice to any party's right to seek further extensions or modifications by agreement or by order of the Court for good cause.

This stipulation does not constitute a waiver by Defendant Matthew Crouch of any defense, including but not limited to the defenses of lack of personal jurisdiction, subject matter jurisdiction or improper venue.

## **IT IS SO STIPULATED.**

DATED: September 11, 2024 BANKS LAW OFFICE

By: /s/ Nico Bank  
Nico Bank (CA SBN: 344705)  
**Attorneys for Plaintiffs**

DATED: September 11, 2024      SOLOMON WARD SEIDENWURM & SMITH, LLP

By: /s/ Levi Y. Silver  
LEVI Y. SILVER  
**Attorneys for Defendant**  
**Matthew Crouch**

## **ATTESTATION**

Pursuant to L.R. 5-4.3.4, I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Nico Banks  
Nico Banks